From: [redacted]
To: Crown Casework
Subject: Objection to Planning Application PCU/RARE/C3105/3378843 – MOD Bicester Site A
Date: 12 September 2026 14:53:20

[redacted]

Dear Secretary of State,

Re: Planning Application PCU/RARE/C3105/3378843 – MOD Bicester Site A, Bicester Garrison, Launton Road, Oxfordshire, OX25 1AE

I am writing to formally object to the above planning application on environmental and ecological grounds.

My principal concern is that the scale and nature of the proposed development could have significant impacts on protected species, habitats, biodiversity, drainage and the wider environment. I am particularly concerned about the potential effects on **bats and Great Crested Newts**, and whether the ecological information currently available is sufficiently comprehensive to enable the application to be properly assessed.

Protected species – bats

The proposed development involves demolition, alterations to existing structures, construction of new accommodation and infrastructure, increased human activity, external lighting, roads and landscaping.

These activities have the potential to affect bats and their habitats.

Bats and their roosts are legally protected, and the ecological assessment should therefore establish whether any buildings, structures or trees within or immediately surrounding the development area have potential to support bat roosts.

I ask that the decision-maker establishes that appropriate and sufficiently comprehensive bat surveys have been undertaken, at suitable times of year and using appropriate survey methodologies.

The assessment should not be limited simply to identifying occupied roosts. It should also consider:

- potential roosting features within existing buildings and structures;
- trees with potential roost features;
- bat foraging areas;
- commuting routes;
- hedgerows, woodland edges and other linear features;
- the effects of vegetation removal;
- the effects of construction activity; and
- the long-term effects of increased artificial lighting.

I am particularly concerned about **light pollution**. The introduction of security lighting, accommodation lighting, roads, parking and other illuminated infrastructure could significantly alter the existing night-time environment.

Artificial light can affect bat behaviour and can effectively sever otherwise suitable commuting and foraging routes.

Any lighting strategy should therefore demonstrate that dark corridors and important ecological features will be retained and protected. Lighting should be carefully controlled in terms of intensity, direction, timing and light spill, with sensitive areas kept dark wherever practicable.

Great Crested Newts

I also have significant concerns regarding the potential impact on **Great Crested Newts (Triturus cristatus)**.

The ecological assessment should consider not only ponds located within the application site but also ponds and suitable terrestrial habitat in the surrounding area.

Great Crested Newts can use terrestrial habitat away from breeding ponds, including grassland, scrub, hedgerows, woodland edges, refuges and other suitable habitat. Consequently, simply identifying whether a breeding population is present within an individual pond would not, in itself, adequately establish the potential ecological impact of this development.

The Secretary of State and decision-maker should be satisfied that appropriate surveys have been undertaken for all potentially relevant ponds and terrestrial habitats within the appropriate survey area.

The assessment should consider:

- potential breeding ponds;
- terrestrial habitat surrounding ponds;
- movement routes between ponds and terrestrial habitat;
- hedgerows, grassland, scrub and woodland;
- potential impacts from demolition and construction;
- excavation and ground disturbance;
- drainage works;
- vegetation clearance;
- changes to land management;
- artificial lighting; and
- increased human and vehicle activity.

If suitable habitat or populations of Great Crested Newts are present, appropriate avoidance, mitigation and compensation measures must be demonstrated before permission is granted.

Ecological connectivity

I am concerned that the proposed development could cause **habitat fragmentation**.

The ecological value of the site should not be considered solely in terms of individual ponds, trees or areas of vegetation. These features can form part of a wider ecological network used by bats, Great Crested Newts and other species.

The proposal should therefore demonstrate how ecological connectivity will be retained throughout the site and between the site and surrounding habitats.

This is particularly important where new roads, parking, buildings, security infrastructure, lighting and hardstanding are proposed.

Adequacy of ecological information

I am concerned that the application should not be determined where significant ecological uncertainties remain.

Where surveys are incomplete, outdated or unable to provide a comprehensive assessment of protected species, the appropriate response should be to obtain the necessary information before determination rather than assume that protected species will not be affected.

Given the scale of the proposal and the extent of proposed demolition, construction and infrastructure works, I consider that a precautionary approach is particularly important.

Biodiversity

The proposal should demonstrate a genuine and measurable biodiversity improvement and should not simply compensate for ecological damage after it has occurred.

Any claimed biodiversity net gain should be supported by transparent calculations, realistic baseline assessments and a long-term management and monitoring strategy.

Established habitats should not be treated as readily replaceable simply because new planting or habitat creation is proposed elsewhere.

Drainage and water environment

I am also concerned about the proposed wastewater treatment infrastructure and the potential implications for the local water environment.

The application should demonstrate that wastewater and surface-water systems have sufficient capacity and that there will be no unacceptable effects on groundwater, watercourses, ponds or other habitats.

This is particularly relevant to Great Crested Newts and other species that may depend upon aquatic and wetland habitats.

Surface-water management should incorporate appropriate sustainable drainage measures and should ensure that development does not increase flood risk or adversely affect surrounding land.

Cumulative environmental impact

The environmental consequences of this proposal should be considered in combination with other development and infrastructure pressures in the

Bicester area.

The cumulative effects of additional buildings, roads, lighting, vehicle movements, drainage infrastructure and increased occupation could place additional pressure on local habitats and ecological networks.

The fact that the proposed use is temporary should not be treated as meaning that its environmental impacts are insignificant. A ten-year period is sufficiently long for substantial ecological consequences to arise.

Request to the Secretary of State

For these reasons, I respectfully ask that the Secretary of State **refuse planning permission unless and until the environmental and ecological issues have been fully investigated and satisfactorily addressed**.

In particular, I ask that the decision-maker ensures:

1. Comprehensive and appropriately timed bat surveys have been undertaken;
2. All buildings, structures and trees with potential bat-roosting features have been assessed;
3. Bat commuting and foraging routes are identified and protected;
4. Appropriate Great Crested Newt surveys have been undertaken for relevant ponds and terrestrial habitats;
5. The wider terrestrial habitat used by Great Crested Newts has been properly considered;
6. Ecological connectivity between ponds, vegetation and other habitats is retained;
7. Artificial lighting is designed to avoid harm to bats and other nocturnal wildlife;
8. The proposed drainage and wastewater arrangements do not adversely affect aquatic habitats;
9. Biodiversity impacts and biodiversity net gain have been properly assessed; and
10. Any outstanding ecological surveys or assessments are completed and independently scrutinised before the application is determined.

I believe that granting permission without resolving these matters would risk causing unacceptable and potentially irreversible harm to protected species

and local biodiversity.

I therefore respectfully request that my objection is taken fully into account in determining application **PCU/RARE/C3105/3378843**.

Yours faithfully,

